

*NOBLE MOTOR-REBUILDERS DIV No-Hazardous*1. EPA ID *MD0004421428*Land Disposal Ban ☒4. Data Entry New ☒Update ☐2. Handler Name *BORROR AUTOMOTIVE REMANUFACTURING CO.*3. Address *P.O. BX. 119, N. WASH. ST., EASTON, MD. 21601*

5. Date of initial evaluation which is basis for report

04/03/89

5a. Agency responsible for evaluation:

E=EPA

O=Other

S=State

B=Con/State

Put code in box *SE*

C=Con/EPA X=Oversight

6. Type of evaluation covered by this report:

Put code in box *L*

1=Compliance Eval. Insp. (CEI)

2=Sampling Insp. 3=Record Review

4=Comp GWM Eval (CME) 5=Compliance Sched

11=Case Dev. Insp. 12=O&M Inspection

10=Other/ General

7. DATE OF EVALUATION COVERED BY THIS REPORT

(enter only if different from 5)

7a. Eval. Comments:

8. CLASS & VIOLATIONS

Violations/Releases

Key	Class of Vio	GWM/ RLSE	C/PC	F R	PtB	C S	Man	L B	Oth
X=Vio, no Spec	I							0	0
B=Vio, & Spec	II							X	X
S=Same Vio/Spec									
Z=Pend. Determ.									
O=No Vio/Spec Found									

Acceptable Codes

Specialties

I=No Insur Only

C=CA Sched Viol

H=HPV

*=Class I Only

X	X	X	X	X	X	X	X	X
S	S	S	S	S	S	S	S	S
Z	Z	Z	Z	Z	Z	Z	Z	Z
O	O	O	O	O	O	O	O	O
H	H	I*	H	C	H	H	H	H
B*		B*		B				

8a. Vio Comment:

MANIFEST COPY NOT LEGIBLE; CME INSPECTION LOG NEEDS TO

9. Enforcement Actions:

HAVE SPACE FOR CHECK-OFF, INITIAL.

Class	Area of Vio/Rel	Type code	Date Act Taken	Comp Date Sch	Date Act	Penalty Ass	Coll	Resp Ag code
<i>II</i>	<i>OTHER</i>	<i>10</i>	<i>04-03-89</i>	<i>IMMEDIATELY</i>	<i>4-6-89</i>			<i>S</i>

Codes for 03=Warn Let 11=Filed Civil Act 15=CA Init Admin
 Types of 04=Adm Comp 12=Filed Criml Act Order
 Enforce. 05=FinAdOrd 18=CivilRef to AG 16=CA Final Admin
 Actions 10=Informal 19=Final Jud Ord Order

Resp Agcy Codes: E=EPA S=State X=EPA Oversight

10. Enforcement Comment:



State of Maryland
~~Department of Health and Mental Hygiene~~
~~Office of Environmental Programs~~
~~201 W. Preston St., Baltimore, MD 21201~~
~~DEPARTMENT OF ENVIRONMENT~~
DHS Inspection Form
Generators/TSD Facilities

YR MO DY
89 04 03
TIME
12 40

EPA ID Number
MD0004491476

TELEPHONE
301-822-1620

Owner/Operator BORRER AUTOMOTIVE Facility Name BORRER AUTOMOTIVE REMEDIATION
Address P.O. Box 119, N. WASHINGTON ST. ELLISTON, MD. 21601
Description of Work Activity ENGINE REBUILDING

I. Generators

A. Description (10.51.03.01-03)

- 1) Does the Facility generate or has it accumulated these quantities of hazardous waste described in 10.51.02.05 G-? ☒ Yes, ☐ No.
- 2) Has the facility obtained an EPA identification number? ☒ Yes, ☐ No.
- 3) Describe the amount of waste generated (day, week or month) 1000 LITERS PER MONTH
- 4) Under which category is the waste(s)?
☒ Ignitable ☐ Reactive ☐ Corrosive
☒ EP Toxic ☐ RCRA Listed

B. Manifest (10.51.03.04)

- 1) Is Maryland manifest system in operation for off-site shipment? ☒ Yes, ☐ No.
- 2) Is TSD Facility to receive DHS identified by ☒ Name, ☒ Address, ☒ EPA ID Number?
- 3) Is alternate facility identified? ☒ Yes, ☐ No.
- 4) Is generator identified by ☒ Name, ☒ Address, ☒ Telephone Number, ☒ MD/EPA ID Number?
- 5) Is each transporter identified by ☒ Name, ☒ EPA ID Number, ☒ Maryland Certification Number?
- 6) Is waste properly described? ☒ Yes, ☐ No.
- 7) Is shipment date marked? ☒ Yes, ☐ No.
- 8) Is quantity of waste described by ☒ Unit of Weight, ☒ Volume?
- 9) Are containers to be loaded identified by ☒ Type, ☒ Number?
- 10) Is proper certification noted and signed by generator? ☒ Yes, ☐ No.
- 11) Are adequate copies available for operator, transporter and TSD? ☒ Yes, ☐ No.

C. Pre-Transport Requirements (10.51.03.05)

- 1) Is each container marked with date accumulation began? ☒ Yes, ☐ No. If yes, has any waste been stored over 90 days? ☒ Yes, ☐ No. How much? 100 LITERS STORAGE PER MONTH 26.13.15.0
- 2) Are containers in good condition? ☒ Yes, ☐ No. If no, explain _____
- 3) Are containers properly labeled? ☒ Yes, ☐ No.
- 4) Does generator have approved emergency contingency plan? ☒ Yes, ☐ No.

D. Recordkeeping and Reporting (10.51.03.06)

- 1) Does the generator have: copies of all signed manifests from the previous three years? ☒ Yes, ☐ No; copies of each Annual Report and Exception Report? ☒ Yes, ☐ No.
- 2) Does the generator retain, for a period of three years, all wastes analyses? ☒ Yes, ☐ No.
- 3) Has the generator filed Exception Reports as required by 10.51.03.06 C? ☒ Yes, ☐ No.

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

- 1) Facility Type
- | | |
|---|---|
| <input type="checkbox"/> Thermal Treatment | <input type="checkbox"/> Biological Treatment |
| <input type="checkbox"/> Recycling/Recovery | <input type="checkbox"/> Land Treatment |
| <input type="checkbox"/> Waste Oil | <input type="checkbox"/> Incineration |
| <input type="checkbox"/> Chemical Treatment | <input type="checkbox"/> Landfill Operation |
| <input type="checkbox"/> Physical Treatment | <input type="checkbox"/> Below Ground Tanks |
| <input type="checkbox"/> Open Pile | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Surface Impoundment | |
| <input type="checkbox"/> Drums | |
| <input type="checkbox"/> Above Ground Tank(s) | |

- 2) Does facility generate DHS? ☐ Yes, ☐ No.
- 3) Does facility have waste analysis plan? ☐ Yes, ☐ No. If yes, are the procedures of that plan being followed? ☐ Yes, ☐ No.
- 4) Can facility personnel identify DHS being handled? ☐ Yes, ☐ No.
- 5) Can facility personnel confirm that DHS received equal those on manifest for: ☐ Yes, ☐ No.
- 6) Is there a 24-Hour surveillance system to monitor active portion of facility? ☐ Yes, ☐ No. If No, is there an artificial or natural boundary? ☐ Yes, ☐ No. Is there a means to control entry? ☐ Yes, ☐ No. Is there a restricted access sign posted? ☐ Yes, ☐ No.
- 7) Does facility have: ☐ emergency equipment inspection log, ☐ written schedule for inspections, ☐ security devices, operating & structural prevention equipment?
- 8) Have facility personnel completed classroom/on-site training? ☐ Yes, ☐ No. Are records maintained of: ☐ Job titles/names of employees, ☐ job descriptions, ☐ Type/amount of continuing training?
- 9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? ☐ Yes, ☐ No.

B. Preparedness and Prevention (10.51.05.03)

- 1) Facility has the following equipment? ☒ Internal communication/alarm system for on-site personnel, ☒ device for summoning emergency assistance, ☒ adequate fire control equipment, water, & suppression chemicals, ☒ list of aforementioned equipment.
- 2) Does facility have adequate area for emergency movement? ☐ Yes, ☐ No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

- 1) Does facility have an approved contingency plan for: ☒ Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water? ☒ Responding emergency units to provide assistance during emergency situations? ☒ A list of emergency equipment needed to cope with situation?
- 2) Are emergency response coordinators listed by name, address, & phone number? ☒ Yes, ☐ No.
- 3) Is there an evacuation plan if recommended? ☒ Yes, ☐ No.
- 4) Are emergency coordinators available on twenty-four hour basis? ☒ Yes, ☐ No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

- 1) ☐ description & quantity of DHS received.
- 2) ☐ method & date of DHS treatment, storage, or disposal.
- 3) ☐ location & quantity at each DHS location in facility.
- 4) ☐ detailed records & results of waste analysis & treatability tests performed.
- 5) ☐ detailed operating summary reports.
- 6) ☐ description of emergency incidents that required implementation of contingency plan.
- 7) ☐ records & results of inspections of emergency equipment, TSD systems & hazardous waste areas.
- 8) Has facility retained, for at least 3 years, copies of all manifests? ☐ Yes, ☐ No.

E. Groundwater Monitoring (10.51.05.06)

- 1) Has facility implemented a groundwater monitoring program? Yes, No, N/A.
- 2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? Yes, No.
- 3) Is this plan set up in accordance with 10.51.05.06 C? Yes, No.
- 4) Has groundwater quality assessment program been prepared? Yes, No.
- 5) Are proper groundwater sampling and analyses records kept? Yes, No.
- 6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? Yes, No.
- 7) Do the reports match the facility records? Yes, No.

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

- 1) Does the facility have an approved closure plan that meets the financial requirements? Yes, No.
- 2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? Yes, No.
- 3) Does facility maintain liability insurance? Yes, No.

G. Container Management (10.51.05.09)

- 1) Are all containers: (a) in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b) lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c) sealed during storage.
- 2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? Yes, No.
- 3) Is an inspection log maintained? Yes, No.
- 4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? Yes, No.
- 5) Are incompatible wastes placed in separate containers? Yes, No.
- 6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? Yes, No.

H. Tanks (10.51.05.10)

- 1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration? Yes, No.
- 2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? Yes, No.
If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? Yes, No.
- 3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? Yes, No.
- 4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? Yes, No.
- 5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? Yes, No.
- 6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? Yes, No.
- 7) Is the level of waste in the tank checked at least once each operating day? Yes, No.
- 8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? Yes, No.
- 9) Are the results of these inspections recorded in an inspection log or summary? Yes, No.
- 10) Are ignitable or reactive wastes stored in tanks? Yes, No. If yes:
a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? Yes, No.

- b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? Yes, No.
- c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? Yes, No.

I. Surface Impoundments (10.51.05.11)

- 1) Is two feet of freeboard maintained in the surface impoundment? Yes, No.
- 2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? Yes, No.
- 3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? Yes, No.
- 4) Is the freeboard level inspected daily? Yes, No.
- 5) Is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? Yes, No.
- 6) Are the results of these inspections recorded in an inspection log or summary? Yes, No.
- 7) Are ignitable or reactive wastes stored in a surface impoundment? Yes, No. If yes:
a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? Yes, No.
- b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? Yes, No.

J. Waste Pile (10.51.05.12)

- 1) Is wind dispersal of the pile controlled? Yes, No, Not Needed.
- 2) Are additions to the pile being analyzed prior to adding them to the pile? Yes, No.
- 3) Is hazardous waste leachate or runoff collected? Yes, No. Is the pile protected from precipitation and runoff? Yes, No.
- 4) Are ignitable or reactive wastes protected from materials or conditions that might cause it to ignite or react? Yes, No, N/A.
- 5) Are incompatible wastes hauled in a manner as to assure separation? Yes, No, N/A.

K. Land Treatment (10.51.05.13)

- 1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? Yes, No.
- 2) Is run-on diverted away from the active portion of the facility? Yes, No. Is run-off from the active portion of the facility collected? Yes, No.
- 3) Has the proper waste analyses been performed? Yes, No.
- 4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? Yes, No.
- 5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? Yes, No.
- 6) Have the additional requirements for a closure and post-closure plan been addressed? Yes, No.
- 7) Are ignitable or reactive wastes immediately incorporated into the soil? Yes, No.
- 8) Are incompatible wastes hauled according to 10.51.05.13? Yes, No.

L. Landfills (10.51.05.14)

- 1) Is run-on diverted away from the facility's active portions? Yes, No.
- 2) Is run-off collected from the landfill's active portions? Yes, No.
- 3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) Yes, No.
- 4) Is the landfill managed so as to control wind dispersal? Yes, No.

- 6) Are the following items maintained in the operating record:
 _____ on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? _____ contents of each cell and approximate location of each hazardous waste type within the cell?
- 7) Are bulk, non-containerized or waste containing free liquids placed in the landfill? _____ Yes, _____ No. If yes: _____ is a leachate collection system available to remove leachate?, and _____ is the liquid stabilized or treated physically or chemically prior to disposal?
- 8) Are empty containers crushed flat or shredded before burial in the landfill? _____ Yes, _____ No.
- 9) Are containers holding liquid wastes (or waste containing free liquids) placed in the landfill? _____ Yes, _____ No. If yes, describe containers on comments below.
- 10) Are ignitable or reactive wastes placed in a landfill? _____ Yes, _____ No. If yes: _____ is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? _____ Are incompatible wastes segregated in different landfill cells?

M. Incinerator/Thermal Treatment (10.51.05.15 & 16)

- 1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
 _____ heating value of the waste;
 _____ halogen content and sulfur in the waste;
 _____ concentrations of lead and mercury unless documented data is available which show these elements not to be present?
- 2) Are instruments related to combustion and emission control monitored at least every 15 minutes? _____ Yes, _____ No.
- 3) Is the stack plume observed visually at least hourly for color and opacity? _____ Yes, _____ No, _____ N/A.
- 4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? _____ Yes, _____ No.
- 5) Is all of the above information documented in the facility's operating record? _____ Yes, _____ No.

N. Chemical, Physical and Biological Treatment (10.51.05.17)

- 1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? _____ Yes, _____ No.
- 2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) _____ Yes, _____ No.

- 3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? _____ Yes, _____ No.
- 4) Is this information recorded in the facility's operating record? _____ Yes, _____ No.
- 5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? _____ Yes, _____ No.
- 6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? _____ Yes, _____ No.
- 7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? _____ Yes, _____ No.
- 8) Are the results of these inspections recorded in an inspection log or summary? _____ Yes, _____ No.
- 9) Are ignitable or reactive wastes placed in a treatment process? _____ Yes, _____ No. If yes:
 _____ Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations?
 _____ Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
- 10) Are incompatible wastes kept from being placed in the same treatment process or equipment? _____ Yes, _____ No.

O. Permit Requirements (10.51.07)

- 1) Does the facility have a DHS permit for its activity?
 Yes, _____ No, _____
 If no, has the facility submitted an application for a DHS permit? _____ Yes, _____ No.
- 2) List any special Permit requirements that are not in full compliance.

Comments: COMPANY APPEARS TO BE GENERATING APPROXIMATELY ONE (1) 55 GAL. DRUM OF ENGINE DEGREASING WASTE EVERY 4 MONTHS. GENERATION RATE WAS PREVIOUSLY HIGHER UNTIL BAKE OVENS BECAME MORE USABLE FOR AUTOMATIVE PARTS. MOST RECENT SHIPMENT: 12-19-88, 1 DRUM 400 LBS DOOR, TRANSPORTED BY STEAM KAT CORP. TO CHEM NET SERVICE COMPANY PRESENTLY CLEANING SLUDGE FROM LEONTO ENGINE DEGREASER TO 55 GAL. DRUM (PREVIOUSLY APPROX. 1/4 FULL) NO OTHER CNS OBSERVED ON SITE. COMPANY INSTRUCTED TO IMPROVE CNS INSPECTION LOG PROCEDURE, EFFECTIVE IMMEDIATELY, AND FORWARDED COPY OF MANIFEST RECEIPT (#1322821-8-17-88)

Inspector's Name: WILLIAM H. PRICE Title: REGIONAL INSPECTOR

Facility Location: N. WASHINGTON STREET, EASTON, MD. 21601

Facility Rep. present during inspection: Jeffrey Parker Title: area plant manager



State of Maryland
 Department of Health and Mental Hygiene
 Office of Environmental Programs
~~201 West Preston Street, Baltimore, Maryland 21201~~
 DEPARTMENT OF ENVIRONMENT
 Report of Observations

MDD 004491478

Type of Inspection/Observations: CNS Date 04/03/89
 Facility Name: BORROR AUTOMOTIVE REMANUFACTURING, P.O. BOX 119
 Remarks: EASTON, MD. 21601 - 301-822-1620
(FORMERLY: BEASLEY INDUSTRIES - NOBLE MOTOR DIV.)

AT APPROXIMATELY 1040 HRS. ON 04-03-89, MDE INSPECTOR W.H. PRICE MET WITH MR. JEFF PARKS, ASST. PLANT MGR. ON THE BORROR (BEASLEY) SITE. SAMPLE # WP040389-01 WAS OBTAINED OF ACCUMULATED RAINWATER FROM AN IN-GROUND CONCRETE PIT FORMERLY USED BY THE COMPANY AS A PRE TREATMENT (SETTLING) PIT FOR WASTE ENGINE DEGREASER, PRIOR TO DISCHARGE TO THE SANITARY SEWER. THIS UNIT WAS CLEANED, DISCONNECTED AND DISCONTINUED IN 1986 AND THE COMPANY PROPOSES BACKFILLING THE TANK AT THIS TIME. THE TANK PRESENTLY CONTAINS APPROX. THREE FEET OF ACCUMULATED (CLEAR) RAINWATER. FIELD PH REVEALS PH = 7.0 (LOTUS). NO ACCUMULATION OF SLUDGES OBSERVED ON SIDES OR BOTTOM OF TANK. COMPANY PROPOSES REMOVAL OF ACCUMULATED RAINFALL TO SANITARY SEWER PRIOR TO BACKFILLING TANK WITH CLEAN FILL; PENDING APPROVAL BY THIS AGENCY. DEGREASING OPERATIONS CURRENTLY ACCOMPLISHED BY MEANS OF (1) BAKE OVENS (2) SAFETY KLEEN UNITS SERVICED BY SAFETY KLEEN CORP (3) SMALL SELF-CONTAINED CAUSTIC DEGREASING UNIT UTILIZING "SPAULK" ALKALINE CLEANING AGENT. CNS GENERATED: APPROX. 1-55 GAL. DRUM / 4 MONTHS FROM "SPAULK" UNIT. ALL SLUDGE FROM SPAULK UNIT IS REMOVED BY (A) FILTER AND (B) SETTLING IN ABOVE GROUND, STEEL TANK MAINTAINED NEXT TO DEGREASING UNIT UTILIZED SPECIFICALLY FOR SLUDGE REMOVAL.

Inspector: W.H. PRICE
 Address: 2500 BROENING HWY.
BALTIMORE, MD. 21224
 Telephone No: 301-631-3400

RCRA LAND DISPOSAL RESTRICTION
 GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

BORROR Automotive REMANUFACTURING Co. Inc.
 A. Handler Name B. Street (or other identifier)
P.O. BOX 119 N. WASHINGTON STREET
EASTON MARYLAND 21601 TALBOT
 C. City D. State E. Zip Code F. County Name
AUTOMOTIVE ENGINE REBUILDING
 G. Nature of Business; Identification of Operations: SIC Code(s)
MDD 004491478
 H. EPA ID #
JEFF PARKS 301-822-1620
 I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 Yes ✓No

(ii) F003 Yes ✓No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes ✓No

b. Source of the above: Form 8700-12 ; Part A ; Part B ; Biennial/Annual Reports ✓
 other (specify) ✓ MANIFESTS

COMPANY FORMERLY
 KNOWN AS BEASLEY INDUSTRIES
 NOBLE MOTORS DIV.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: BORROR AUTOMOTIVE
ID Number: MD0004491478
Inspector: PRICE
Date: 4-3-89

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No
(ii) F028 ☐ Yes ☒ No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 ☐ Yes ☒ No
(ii) D004 - D011 ☒ Yes ☐ No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☒ Yes ☐ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☐ Yes ☒ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ☐ Yes ☒ No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☐ Yes ☒ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☐ Yes ☒ No

2/ A potential violation is indicated

Handler Name: BORROR AUTOMOTIVE
ID Number: MDP 004491478
Inspector: PRICE
Date: 4-3-89

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ☒; other (specify) ☒. MANIFESTS

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

N/A

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

N/A

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☒ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☒ No*

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ☒; other (specify) ☒. MANIFESTS

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☒ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☒ No*

2/ A potential violation is indicated

Handler Name: BORROR Automotive
ID Number: MD0004491478
Inspector: PRICE
Date: 4-3-89

Comments

3. F Solvents - -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

N/A Yes ___ No*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

___ Yes ✓ No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

N/A Yes ___ No*

- b. Does the facility handle K061 wastes?

___ Yes ✓ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

N/A Yes ___ No*

- c. Does the facility handle K101 or K102 wastes?

___ Yes ✓ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

N/A Yes ___ No*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

___ Yes ✓ No

2/ A potential violation is indicated

Handler Name: BORRER Automotive
ID Number: MD0004491478
Inspector: PRICE
Date: 4-3-89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes Yes ☒ No

- (i) List wastes for which "applied knowledge" was used:

b. TCLP Yes ☒ No

- (i) List wastes for which "TCLP" was used:

N/A

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP?

N/A Yes ☐ No

If yes, list: _____

c. Total waste analysis Yes ☒ No

- d. If files were retained, describe content and basis of applied knowledge determination:

None

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: N/A

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

GENERATOR HAS
NOT ANALYZED THE
WASTESTREAM TO
DETERMINE STATUS
UNDER LDR.

Handler Name: BORROR Automotive
ID Number: MD004491478
Inspector: PRILE
Date: 4-3-84

Comments

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?

N/A Yes ___ No*

2. Did the restricted wastes exceed applicable treatment group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

NO ANALYSES

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] ___ Yes* ✓ No

D. Management

1. Onsite management

- a. Were restricted wastes managed onsite? ___ Yes ✓ No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? ___ Yes ___ No

If yes, TSDP checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ___ Yes ✓ No*

(ii) Corresponding treatment standard? ___ Yes ✓ No*

(iii) Manifest number? ___ Yes ✓ No*

(iv) Waste analysis, if available? ___ Yes ✓ No

2/ A potential violation is indicated

Handler Name: BORROR Automotive
ID Number: MD004491478
Inspector: PRICE
Date: 4-3-89.

Comments

Identify offsite treatment facilities

CHEM MET SERVICES - MD0096963194

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:
- (i) EPA hazardous waste I.D. number? ☐ Yes ☒ No*
 - (ii) Corresponding treatment standard? ☐ Yes ☒ No*
 - (iii) Manifest number ☐ Yes ☒ No*
 - (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☒ No*

Identify land disposal facilities receiving the

BDAT certified wastes CHEM-MET SERVICES

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- N/A
- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
 - (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
 - (iii) All applicable prohibitions? ☐ Yes ☐ No*
 - (iv) The manifest number? ☐ Yes ☐ No*
 - (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
 - (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

Handler Name: BORROR Automotive
ID Number: MDP 004491178
Inspector: PRICE
Date: 4-3-89

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]:

N/A

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

N/A

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]: N/A

The EPA Hazardous Waste Number? Yes No*

Applicable prohibitions? Yes No*

The manifest number? Yes No*

Waste analysis data, where available?
Yes No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? Yes No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? Yes No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? Yes No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? Yes No*

Handler Name: BORROR Automotive
ID Number: MD0004491478
Inspector: PRICE
Date: 4-3-89

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? N/A Yes ___ No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? N/A Yes ___ No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ___ Yes ✓ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ___ Yes ___ No*

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___ Yes ✓ No N/A

If yes, list type of treatment unit and processes

If yes, TSD checklist must be completed.



1478 State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

50087-114
* ATTACHMENT
#1

Report of Observations

Type of Inspection/Observations: CHS/WATER POLLUTION Date 12/17/86
Facility Name: NOBLE MOTOR REBUILDERS - BEASLEY INDUSTRIES - N. AURORA ST.
Remarks: EASTON, MD. 21601 301-822-1620

- CONTINUED FROM SITE COMPLAINT #500-87-114

(3) WITHIN 30 WORK DAYS FROM RECEIPT OF THIS NOTICE NOBLE MOTOR REBUILDERS (BEASLEY INDUSTRIES INC.) SHALL SUBMIT TO THE ADMINISTRATION FOR APPROVAL, A PLAN INCLUDING, BUT NOT LIMITED TO:

(A) A COMPREHENSIVE ASSESSMENT OF GROUNDWATER IN THE AREA OF NOBLE MOTOR REBUILDERS, CONDUCTED BY COMPETENT AGENT OR AUTHORITY TO DETERMINE AND/OR DELINEATE ANY GROUNDWATER CONTAMINATION RESULTING FROM LEAKAGE OR DISCHARGE OF WASTE ENGINE DEGREASER/RINSE SOLUTION FROM THE IN-GROUND WASTE TANK.

(B) PROPOSED CORRECTIVE ACTION TO BE CARRIED OUT BY NOBLE MOTOR REBUILDERS (BEASLEY INDUSTRIES INC.) ON SITE ADDRESSING: DECONTAMINATION, REMOVAL AND/OR DISPOSAL OF THE IN-GROUND TANK, REMOVAL OF CONTAMINATED SOIL.

(C) INSTALLATION AND SAMPLING OF GROUNDWATER OBSERVATION WELLS: ONE UPGRADIENT AND THREE DOWNGRADIENT.

(D) SOIL BORINGS AS REQUIRED WITH SOIL ANALYSES.

(E) PHYSICAL SURVEY OF WELLS USED WITHIN A 1/2 MILE RADIUS OF THE NOBLE MOTOR REBUILDERS SITE.

(F) INFORMATION ON THE HISTORICAL USE OF SOLVENTS, DEGREASING AGENTS OR OTHER CHEMICALS ON SITE, AND THEIR APPROXIMATE PERIOD OF USE.

(G) DETERMINATIONS OF GROUNDWATER FLOW (DIRECTION) AND GROUNDWATER TRANSMISSIVITY AS WELL AS DETERMINATION OF SOIL PH AND REDOX POTENTIAL AND SPECIFIC SOIL TYPES. (SOIL CLASSIFICATION).

(4) A SITE CONTINGENCY PLAN; PERSONNEL TRAINING PROCEDURE AND EMERGENCY PREPAREDNESS AND PREVENTION DATA AS REQUIRED OF GENERATORS OF HAZARDOUS WASTE BY

Observer: William H. Price Person Interviewed: J. E. L.



1978 State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

SCO-87-114
* ATTACHMENT
#2

Report of Observations

Type of Inspection/Observations: CNS/WATER POLLUTION Date 12/17/86
Facility Name: NABLE MOTOR REBUILDERS - BEASLEY INDUSTRIES INC.
Remarks: N. AURORA ST. EASTON, MD. 21601 - 301-822-1620.

- CONTINUED FROM ATTACHMENT #1 OF SITE COMPLAINT SCO 87-114.

COMAR 10.51.03.05E AND DEFINED BY:

COMAR 10.51.05.02G - PERSONNEL TRAINING

COMAR 10.51.05.03 - EMERGENCY Preparedness & Prevention

COMAR 10.51.05.04 - CONTINGENCY PLAN.

MUST BE SUBMITTED FOR APPROVAL BY NABLE MOTOR REBUILDERS (BEASLEY INDUSTRIES INC.) TO THE ADMINISTRATION WITHIN 30 WORK DAYS FROM RECEIPT OF THIS NOTICE.

ANY PROPOSED SYSTEM OF WASTE DISPOSAL WHICH WILL DISCHARGE TO THE MUNICIPAL SEWER SYSTEM WILL REQUIRE PRIOR WRITTEN APPROVAL FROM THE EASTON MUNICIPAL SEWER AUTHORITY.

A HAZARDOUS WASTE STORAGE PERMIT IS REQUIRED FOR STORAGE OF HAZARDOUS WASTE FOR LONGER THAN 90 DAYS.

Observer: William H. Lico

Person Interviewed: [Signature]



STATE OF MARYLAND

DEPARTMENT OF HEALTH AND MENTAL HYGIENE

OFFICE OF ENVIRONMENTAL PROGRAMS

P.O. BOX 13387

201 W. PRESTON STREET

BALTIMORE, MARYLAND 21203

(301) 383-6650

Nonhandler

SITE COMPLAINT

NUMBER

DATE

SC-0- 87-114

12-17-86

Now-H.

1. Name of violator: BEASLEY INDUSTRIES INC. - MOBILE MOTOR REBUILDERS
Address: P.O. Box 119, N. AVENUE ST., EASTON, MARYLAND 21601
County: TALBOT Phone: 301-822-1620

2. Violation Type (with reference to Maryland Code)

☒ Water Pollution Control and Abatement (Health Environmental Article, Sections 9-301 through 9-344)

☐ Controlled Hazardous Substances (Health Environmental Article, Sections 7-201 through 7-268)

☐ Landfills and Sludge Disposal (Health Environmental Article, Section 9-210)

☐ Other

3. Specifically: ON 11-24-86 IT WAS OBSERVED THAT AN APPROXIMATE 300-400 GAL IN-GROUND STORAGE TANK CONSTRUCTED OF CEMENT BLOCKS WAS BEING USED BY MOBILE MOTOR REBUILDERS TO RECEIVE WASTE ENGINE DEGREASER AND RINSE SOLUTION PRIOR TO DISCH OF THE SOLUTION TO THE EASTON MUNICIPAL SEWER SYSTEM. THE STRUCTURAL INTEGRITY OF THE TANK CANNOT BE DETERMINED. COMPANY REPRESENTATIVE AFFIRMED ON 12-12-86 THAT TANK LEAKS (INFILTRATION) DURING PERIODS OF HEAVY RAIN. THIS MATERIAL IS LOCATED IN AN AREA LIKELY TO REACH GROUNDWATERS OF THE STATE.

4. The existence of the above-mentioned violation(s) may subject you to prosecution and penalty. Accordingly, you are advised that the following corrective actions are necessary to remedy the violation(s).

- ① IMMEDIATELY UPON RECEIPT OF THIS NOTICE, CEASE AND DESIST PLACEMENT OF ANY MATERIAL IN THE IN-GROUND (WASTE) TANK MENTIONED ABOVE.
- ② BY 12-31-86 HAVE WASTE CONTENTS REMOVED FROM TANK INCLUDING SLUDGES ADHERING TO SIDES OF THE TANK. PLACE WASTE IN APPROVED CONTAINERS, LABELLED, MARKED AND DATED IN ACCORDANCE WITH COMAR 10.51.03.05; TRANSPORT WASTE BY CERTIFIED HAZ WHAULER TO LICENSED HAZARDOUS WASTE DISPOSAL SITE UTILIZING REGULAR CHS MANIFEST.

5. Continuation of the violation(s) or failure to take the corrective action described above may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties.

5. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: William H. Price Title: Inspector

Authorized by: William Eichbaum
Assistant Secretary for
Environmental Programs

Issued by: William H. Price
Inspector

Phone: 301-225-5731 - 301-758-2021

NOBLE MOTOR REBUILDERS DIV

GEN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

~~Bentley Industries~~
MDD 04 49 1478

DATE: 7/29/87

FROM: Vernon Butler, Environmental Engineer
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING THESE VIOLATIONS.

Attachment



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

1 of 2

Report of Observations

Type of Inspection/Observations: CNS Date 06/12/87

Facility Name: BEASLEY INDUSTRIES MOBILE DIVISION - EASTON, MD. 21601

Remarks: AT APPROXIMATELY 1020 HRS. ON 06-12-87, W.H. PRICE
INSPECTOR, O.E.P./MDA, MET WITH MR. JEFF PARKS OF BEASLEY
INDUSTRIES AT THE FACILITY SITE. INSPECTION OF THE IN-GROUND
CEMENT BLOCK WASTE TANK, PREVIOUSLY CONNECTED TO THE EASTON
SEWER AND USED FOR HANDLING WASTE ENGINE DEGREASING
SOLUTION REVEALS THAT EACH OF THE THREE COMPARTMENTS OF THE
TANK CONTAINS APPROXIMATELY 2-3 INCHES OF DARK LIQUID WHICH
APPEARS TO BE WATER. THE ENTIRE TANK WAS COVERED BY A PLASTIC
SHEET WHICH WAS WEIGHTED DOWN AT THE ENDS BY CEMENT BLOCKS.
SHEETS (3 SEPARATE OVERLAPPING SHEETS) OF APPROXIMATELY 3/8"
PLYWOOD ARE PLACED ON TOP OF THE TANK, OVER THE PLASTIC SHEET
THE PLASTIC COVERING THE 3RD COMPARTMENT OF THE TANK HAD BEEN
REPPED SEVERELY. IT CANNOT BE ASCERTAINED WHETHER THE
LIQUID INSIDE THE TANK COMPARTMENTS IS A RESULT OF
PRECIPITATION WHICH ENTERED BY RUNNING UNDER THE PLYWOOD
SHEETS AND THROUGH HOLES IN THE PLASTIC, OR WHETHER WATER
HAS INFILTRATED INTO THE TANK THROUGH UNKNOWN CRACKS,
JOINTS OR HOLES IN THE TANK WALLS AND/OR BASE.

INSPECTION OF THE NEW DEGREASING UNIT INSIDE THE
PLANT REVEALS THAT THE DEGREASING UNIT IS CONNECTED BY
APPROXIMATE TWO (2") INCH PIPES TO A CONCRETE AND STEEL
SUMP (PIT) IN THE FLOOR OF THE PLANT (APPROX. 3'FT, 3'FT X 3'FT)
AND A LARGE (APPROX. 8'FT X 4'FT X 3'FT) STEEL, ABOVE GROUND
TANK WHICH HAS BEEN DIVIDED INTO THREE COMPARTMENTS.
ACCORDING TO MR. PARKS, WHEN THE DEGREASING SOLUTION
BECOMES DIRTY, THE PUMP WITHIN THE SUMP PIT (FLOOR) IS
ACTIVATED AND THE DEGREASING SOLUTION FROM THE
DEGREASING UNIT IS MOVED THROUGH PIPES TO THE SUMP
PIT AND THEN INTO THE LARGE STEEL (3 COMPARTMENT)
TANK. AFTER THE SOLUTION HAS BEEN REMOVED FROM THE ACTUAL
DEGREASER UNIT, THE SLUDGE WHICH REMAINS IN THE
BOTTOM OF THE DEGREASING UNIT IS MANUALLY REMOVED AND
PLACED INTO A 55-GAL. DRUM FOR DISPOSAL AS CNS.

Observer: William N. Price Person Interviewed: _____



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

2 of 2

Report of Observations

Type of Inspection/Observations: CNS Date 06/12/87

Facility Name: BEASLEY INDUSTRIES - NOBLE DIVISION - EASTON, MD.

Remarks: - CONTINUED FROM PG. 1 -

AFTER REMOVAL OF SLUDGE FROM THE UNIT, THE LIQUID DEGREASING SOLUTION IS PUMPED FROM THE STEEL HOLDING TANK (3-COMPARTMENT) BACK INTO THE DEGREASING UNIT. AN UNDETERMINED AMOUNT OF DEGREASING SOLUTION IS LOST DUE TO EVAPORATION DURING THE DEGREASING OPERATION AND ADDITIONAL SOLUTION IS PERIODICALLY ADDED TO THE UNIT FROM THE STEEL HOLDING TANK. MR. PARKS ESTIMATES THAT THE WASTE SLUDGE IS GENERATED AT A RATE OF APPROXIMATELY 1/3 OF A 55 GAL. DRUM PER MONTH OR 1 DRUM / 90 DAYS. PRESENTLY ONE (1) 55 GAL. DRUM OF SLUDGE IS ON HAND AT THE SITE, DATED 04-16-87. ACCORDING TO PARKS, STERN MAT CORP. HAS BEEN REMOVING THE SLUDGE (CNS) ON A 90 DAY CYCLE FOR DISPOSAL AT A CNS FACILITY IN NEW JERSEY.

A GRATED FLOOR DRAINAGE SYSTEM WITHIN THE DEGREASING ROOM CONNECTS TO THE (FLOOR) SUMP PIT AND CAN SERVE AS A SPILL CONTAINMENT SYSTEM FOR THAT AREA ACCORDING TO PARKS.

Observer: William N. Price Person Interviewed: _____

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: <i>Mr. Fisher</i> <i>File</i>	FROM: <i>J. Henry</i>	DATE <i>2/19/81</i>	TIME <i>4:00</i>
SUBJECT <i>TSD Status for Noble Motor Rebuilders</i>			
SUMMARY OF COMMUNICATION <p><i>called Mr Fisher to double check the activity with their letter. He was not in - He will call me back.</i></p> <p><i>2/25 - I called - The line was busy.</i></p> <p><i>3/13 - I called again. Mr Fisher was not in. I spoke with Mr. Carpenter. He said they only activity they do is have some petro. sludge pumped out. I will change activity to generator.</i></p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

2-1-84

RECEIVED
Waste Management Section

EPA

FEB 7 1984

6th & WALNUT ST.

Philadelphia, PA. 19106 U.S. Env. Agency

WASTE MANAGEMENT BRANCH

ATTN: Shirley

As per our phone conversation of 2-1-84, we do not generate any hazardous waste at this location. We use a Pyrolysis Furnace to clean old blocks and parts. This is notification to Resend our EPA ID # MDD.004491478.

NOBLE MOTOR REBUILDERS

P.O. Box 119 N. AURORA ST.

Easton, MD. 21601

If you have any questions please call :
301-822-1620 - TERRI

Thank you
Terri Phillips

NOBLE MOTOR REBUILDERS

P.O. BOX 119

EASTON, MD. 21601

N. AURORA ST.
EASTON, MD. 21601
301-822-1620

Remanufactured Engines
Crankshaft Kits

313 MYSTIC AVE.
MEDFORD, MASS. 02155
617-396-3303

July 28, 1980

EPA - Region III
PO Box 1460
Philadelphia, PA 19170

Re: Noble Motor Rebuilders Div.
Beasley Industries, Inc.

Gentlemen:

We have received your form EPA 8700-12, Notification of Hazardous Waste Activity, and accompanying enclosures.

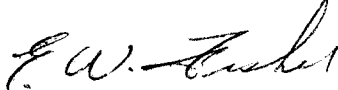
We use several chemicals in our process of remanufacturing automotive engines and since we are unable to find either of these chemicals listed in form EPA 8700-12 (FR), we are describing them and our use of them.

We purchase from Maryland Chemical Co., Inc., Russell & Bayard Sts., Baltimore, MD 21230, caustic soda, dry, (Sodium Hydroxide) and Wyandotte "spaulk". Both chemicals are used in solution in cleaning used engine cores and related parts. The resulting liquid, which contains some petroleum sludge that is cleaned off the engine cores, is pumped through three (3) all brick settling tanks on the exterior of the main building. Approximately every four (4) weeks, Livingston Septic Service, Solitude Rd., St. Michaels, MD 21663, drains the fluid remainder and contents of the settling tanks from the premises.

This letter is attached to form EPA 8700-12 for clarification purposes.

Very truly yours,

Noble Motor Rebuilders



E. W. Fisher
General Manager

ENF:djg

NOBLE-BILT

ESTABLISHED 1941

W	M	D	D	0	4	4	9	1	4	7	8	3	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

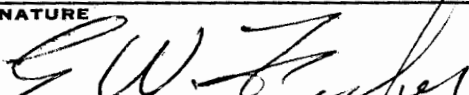
☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

See letter attached

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

E.W. Fisher, Gen. Mgr.

DATE SIGNED

7-28-80



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MDD 00 449 1478

INSTALLATION ADDRESS

E. W. Fisher
Noble Motor Rebuilders Div.
P. O. Box 119
Easton, MD 21601

North Aurdra Street
Easton, MD 21601

Beasley Industries, Inc.
Noble Division
P. O. Box 119
Easton, MD 21601-0119



EPA
6th & WALNUT ST.
Philadelphia, PA. 19106

Waste Management BRANCH
ATTN: Shirley